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Attorneys for Brooke M. Hawes

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

PG&E Corporation,

and

PACIFIC GAS AND ELECTRIC
 COMPANY,

Debtors.

Case No. 19-30088-DM

Chapter 11

Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. P.
 9006(b)(1) TO ENLARGE THE TIME FOR
 BROOKE M. DAWES TO FILE PROOFS
 OF CLAIM**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
 No. 19-30088-DM,

Date: July 7, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: July 2, 2020
 4:00 p.m. (Pacific Time)

I, Richard Frankel, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP, based in Redding, California.

2. My law firm represents wildfire victims who sustained losses from the Camp Fire in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses clients have suffered as a result of these fires.

3. Ms. Brooke Hawes delivered paper copies of client intake documents, including

1 our firm engagement agreement, and claim details, to our office in December 2019. She owned a
2 mobile home in Magalia which suffered smoke damage as a result of the Camp Fire. She also lost
3 personal property from the fire and had to flee her home.

4 4. Our firm has used a database to track client engagements and representations in
5 these matters, including to track deadlines, client information and data, and that data was used as
6 the source data to populate and file proofs of claims for our clients. Unfortunately, through
7 mistake, inadvertence, or oversight, it appears that Ms. Hawes' paperwork and file information
8 was not input by our staff into our client database after she hired us on December 9, 2019, for
9 which I take responsibility.

10 5. The extended December 31, 2019 Bar Date Deadline passed and because Ms.
11 Hawes' data had not been input into our client database, no Proof of Claim form was filed on her
12 behalf.

13 6. We conducted an audit of our data base in late May 2020. As soon as I became
14 aware that no proof of claim was filed for Ms. Hawes, and within one week, we filed her proof of
15 claim (on June 4, 2020), and sought the assistance of local counsel to file this Motion.

16 7. I am over eighteen years of age, of sound mind, and fully-competent to make this
17 declaration. All statements in this declaration are based on my own personal knowledge and
18 observation and from my review of the court and business records in this case, or upon
19 information and belief as indicated. If called to testify on this matter, I can and would competently
20 testify to the matters set forth in this Declaration.

21 I declare under penalty of perjury pursuant to the laws of the United States of America that
22 the foregoing is true and correct.

23 Executed this 5th day of June, 2020, in Houston, Texas.

24
25 By: 

26 RICHARD FRANKEL
27
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